

ATTORNEYS AT LAW

nmllplaw.com

Ira S. Nesenoff Andrew T. Miltenberg Stuart Bernstein

Tara J. Davis Gabrielle M. Vinci Christine Brown Kara L. Gorycki Barbara H. Trapasso Adrienne D. Levy Regina M. Federico Ben Goldstein Kristen Mohr Helen Setton Jordan Tuchman Susan E. Stark Julie A. Sacks Nicole Hoehle Senior Litigation Counsel

Marybeth Sydor Title IX Consultant

September 30, 2024

VIA ECF AND EMAIL

The Honorable Robyn F. Tarnofsky United States District Judge United States District Court Southern District of New York 40 Foley Square, Room 2103 New York, New York 10007 Application granted.

Date: 9/30/2024 New York, NY SO ORDERED

ROBYN F. TARNOFSKY

UNITED STATES MAGISTRATE JUDGE

Re: Khodakhah v. Montefiore Health System, Inc. et al., No 1:24-cv-00839 Joint Proposed Scheduling Order

Dear Magistrate Judge Tarnofsky:

We represent Plaintiff Kamran Khodakhah ("Plaintiff") in the above-captioned action. We write on behalf of all the parties in accordance with the Court's July 31, 2024 Order (Dkt. No. 45). The parties respectfully submit below their proposed briefing schedule regarding Plaintiff's Amended Complaint which was filed on September 23, 2024.

The parties shall adhere to the following briefing schedule with respect to:

- 1. <u>Defendants' Motions to Dismiss shall be filed on or before November 15, 2024.</u>
- 2. Plaintiff's oppositions shall be filed on or before December 13, 2024.
- 3. Defendants' replies, if any, shall be filed on or before January 17, 2025

Respectfully Submitted,

/s/ *Andrew T. Miltenberg, Esq.*Andrew T. Miltenberg, Esq.